UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

NAPLETON'S ARLINGTON HEIGHTS MOTORS, INC. f/k/a NAPLETON'S PALATINE MOTORS, INC. d/b/a NAPLETON'S ARLINGTON HEIGHTS CHRYSLER DODGE JEEP RAM. an Illinois corporation; NAPLETON'S RIVER OAKS MOTORS, INC. d/b/a NAPLETON'S RIVER OAKS CHRYSLER DODGE JEEP RAM, an Illinois corporation; CLERMONT MOTORS, LLC d/b/a NAPLETON'S CLERMONT CHRYSLER DODGE JEEP RAM, an Illinois limited liability company; NAPLETON'S NORTH PALM AUTO PARK, INC. d/b/a NAPLETON'S NORTHLAKE CHRYSLER DODGE JEEP RAM, an Illinois corporation; NAPLETON ENTERPRISES, LLC d/b/a NAPLETON'S SOUTH ORLANDO CHRYSLER DODGE JEEP RAM, an Illinois limited liability company; NAPLETON'S MID RIVERS MOTORS, INC. d/b/a NAPLETON'S MID RIVERS CHRYSLER DODGE JEEP RAM, an Illinois corporation; NAPLETON'S ELLWOOD MOTORS, INC. d/b/a NAPLETON'S ELLWOOD CHRYSLER DODGE JEEP RAM, an Illinois corporation,

Case No. 1:16-cv-00403-VMK-SMF

Plaintiffs,

v.

FCA US LLC, a Delaware corporation

Defendant.

STATUS REPORT

In accordance with the Court's order of April 26, 2017 (ECF No. 114), FCA US LLC ("FCA") submits this Status Report concerning the addition of FCA employees Reid Bigland,

Kurt Mitzner, and Chris Glenn as ESI custodians in this litigation. In accordance with the Court's order, FCA has run the agreed search terms/strings across the ESI for Messrs. Bigland, Mitzner, and Glenn. FCA submits this Status Report to inform the Court that FCA has agreed to include Messrs. Bigland, Mitzner, and Glenn as additional ESI custodians. As FCA has already informed the Plaintiffs, although adding these three new ESI custodians increases FCA's review burden, in the interest of compromise and to minimize disputes that would require the Court's intervention, FCA has agreed to the Plaintiffs' request to add these ESI custodians, bringing the total number of FCA custodians to 18.

Dated: May 12, 2017 Respectfully submitted,

/s/ Robert D. Cultice

Of Counsel:

Robert D. Cultice (admitted pro hac vice)
Felicia H. Ellsworth (admitted pro hac vice)
Caitlin W. Monahan (admitted pro hac vice)
Michael J. Horrell (admitted pro hac vice)
WILMER CUTLER PICKERING HALE AND DORR LLP
60 State Street
Boston, MA 02109
(617) 526-6000
robert.cultice@wilmerhale.com
felicia.ellsworth@wilmerhale.com
caitlin.monahan@wilmerhale.com
michael.horrell@wilmerhale.com

Randall L. Oyler
Owen H. Smith
Brandon C. Prosansky
Katherine A. Neville
BARACK FERRAZZANO KIRSCHBAUM &
NAGELBERG LLP
200 West Madison Street
Suite 3900
Chicago, IL 60606
(318) 984-3100
randalloyler@bfkn.com

owen.smith@bfkn.com brandon.prosansky@bfkn.com katie.neville@bfkn.com

Attorneys for Defendant FCA US LLC

CERTIFICATE OF SERVICE

I hereby certify that this document filed through the CM/ECF system will be served upon counsel for Plaintiffs electronically via the CM/ECF system on May 12, 2017.

/s/ Robert D. Cultice

Robert D. Cultice (admitted pro hac vice)
WILMER CUTLER PICKERING HALE AND DORR LLP
60 State Street
Boston, MA 02109

Tel: (617) 526-6000 Fax: (617) 526-5000

robert.cultice@wilmerhale.com